

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION 211 W. FORT STREET, SUITE 1800

DETROIT, MICHIGAN 48226

CHAPTER 9

IN RE: CITY OF DETROIT, MICHIGAN,

CASE NO. 13-53846

Debtor

HONORABLE STEVEN W. RHODES

X

OBJECTIONS TO THE PETITION FILED BY ONE KEVYN D. ORR SEEKING TO COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES CODE ON BEHALF OF THE CITY OF DETROIT, MI

I, Jo Ann Watson (dob 04/13/1951) received a notice by way of the U. S. Postal Service delivery at my residence, 100 Riverfront Drive, apt. 1508, Detroit, MI 48226 on Saturday, August 17, 2013. The notice was captioned to "All Creditors of the City of Detroit, Michigan, and to other Parties of interest".

In response to said notice, (received from KCC 2335 Alaska Avenue, El Segundo, CA 90245; and delivered to my residential mail box attn: PRF 80134 11537400 Jo Ann Watson one calendar day before the deadline date for filing objections); I do hereby file objections to the petition filed by Kevyn D. Orr, seeking to commence a case under Chapter 9 of the U. S. Bankruptcy Code on behalf of the City of Detroit, State of Michigan. In support of said objections, I state the following:

Summary of Facts:

- 1 I was elected to the legislative body of the City of Detroit, the Detroit City Council on April 29, 2003 and the oath of office was administered to me by the Detroit City Clerk on May 14, 2003, whereupon I became a participant and contributor to the City of Detroit General Retirement System. I became 100% vested in the Detroit General Retirement System on May 14, 2013, the anniversary of my tenth year of service as an elected official.
2. Pursuant to the policies which govern the Detroit General Retirement System, upon the conclusion of my term in office, December 31, 2013, based upon my age, my years of service, and my final annual compensation, I expect to receive a monthly pension and health care benefits from the Detroit General Pension System.

(More)

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Objection 1

Kevyn D. Orr was appointed Emergency Financial Manager of The City of Detroit, Michigan by Michigan Governor Rick Snyder, on or about March 28, 2013. Subsequent to his appointment by the Governor, Kevyn D. Orr filed the bankruptcy petition on behalf of the City of Detroit. Under Chapter 9, only the duly elected representatives of the City of Detroit have the power and authority to file said petition. The State of Michigan, through the duly elected Governor, has the authority and power to approve said petition; but I object to the Governor (through his represented appointee) filing the petition, and also approving said petition; particularly against the backdrop of Federal lawsuits filed (now stayed) which challenge the constitutionality of the Emergency Manager Law and the statewide repeal of the Emergency Manager Law by 2.3 million citizens in a statewide referendum November 6, 2012. Kevyn D. Orr was appointed under a law that did not exist—Public Act 72, the predecessor to the Emergency Manager Law PA 4 which was repealed. In December 2012, during a lame duck session of the Michigan legislature, a new Emergency Manager bill was passed, and the new law—PA 436—was implemented in March, 2013. Because PA 72 could not have been in effect legally, Kevyn Orr could not have been “grandfathered” in under the new law PA 436. Thus, Kevyn Orr lacks the authority to file said bankruptcy petition on behalf of the City of Detroit. The code for bankruptcy under federal law cites that local elected officials of the municipality have to declare bankruptcy—there is no provision for a State appointee or an Emergency Manager to file.

Objection 2

The State of Michigan Constitution expressly prohibits government pension benefits from being eliminated or reduced. Therefore, public pensions, which are presently being paid, or that will be paid in the future, should be excluded from consideration under this bankruptcy petition, even if the bankruptcy petition is granted.

Objection 3

In addition to the objections cited herein, I hereby reserve the right to join in the objections raised by others which are relevant to my specific situation or this matter in general.

Respectfully submitted,

By Jo Ann Watson

Jo Ann Watson #1508
100 Riverfront Drive Detroit MI 48226

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

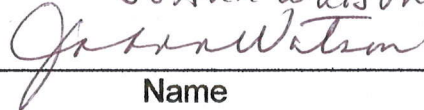
In re
CITY OF DETROIT, MICHIGAN,
Debtor

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

**OBJECTIONS TO THE PETITION FILED BY ONE KEVYN D. ORR SEEKING TO
COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES
CODE ON BEHALF OF THE CITY OF DETROIT, MICHIGAN**

PROOF OF SERVICE

I hereby assert that on August 19, 2013, I filed the above Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Bankruptcy Code on Behalf of the City of Detroit and served said Objections upon the following parties of record via United States Mail.

JoAnn Watson

Name

Counsel to the Debtor
David G. Heiman, Esq.
Heather Lennox, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190
T: (216) 586-3939
F: (216) 579-0212
<http://www.jonesday.com>

Counsel to the Debtor
Jeffrey B. Ellman, Esq.
Jones Day
1420 Peachtree Street, NE
Suite 800
Atlanta, GA 30309-3053
T: (404) 521-3939
F: (404) 581-8330
<http://www.jonesday.com>

Counsel to the Debtor

Bruce Bennett, Esq.
Jones Day
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071
T: (213) 489-3939
F: (213) 243-2539
<http://www.jonesday.com>

Local Counsel to the Debtor

Jonathan S. Green, Esq.
Stephen S. LaPlante, Esq.
Miller, Canfield, Paddock & Stone, P.L.C.
150 West Jefferson
Suite 2500
Detroit, MI 48226
T: (313) 963-6420
F: (313) 496-7500
<http://www.millercanfield.com>

Office of the United States Trustee
U.S. Department of Justice
211 West Fort Street
Suite 700
Detroit, MI 48226
T: (313) 226-7999
F: (313) 226-7952
<http://www.justice.gov/ust/r09>

DATED: August 19, 2013